

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

TQ DELTA, LLC,

Plaintiff,

v.

**COMMSCOPE HOLDING COMPANY, INC.,
COMMSCOPE INC., ARRIS
INTERNATIONAL LIMITED, ARRIS
GLOBAL LTD., ARRIS US HOLDINGS, INC.,
ARRIS SOLUTIONS, INC., ARRIS
TECHNOLOGY, INC., and ARRIS
ENTERPRISES, LLC**

Defendants.

CIV. A. NO. 2:21-CV-310-JRG
(Lead Case)

TQ DELTA, LLC,

Plaintiff,

v.

**NOKIA CORP., NOKIA SOLUTIONS AND
NETWORKS OY, and NOKIA OF AMERICA
CORP.,**

Defendants.

CIV. A. NO. 2:21-CV-309-JRG
(Member Case)

**DEFENDANTS' OPPOSED MOTION FOR LEAVE TO FILE
SUPPLEMENTAL BRIEF REGARDING SECOND OPPOSED
MOTION FOR ENTRY OF ORDER FOCUSING PATENT CLAIMS**

Defendants Nokia of America Corporation, Nokia Corporation, Nokia Solutions and Networks Oy (collectively, "Nokia"), and CommScope Holding Company, Inc., CommScope Inc., ARRIS International Limited, ARRIS Global Ltd., ARRIS US Holdings, Inc., ARRIS Solutions, Inc., ARRIS Technology, Inc., and ARRIS Enterprises, LLC (collectively, "CommScope") (together, "Defendants") respectfully request leave to file a supplemental brief regarding their

second narrowing motion to address TQ Delta's continued gamesmanship in this case, demonstrating the need for additional narrowing at this stage of the litigation.

Without providing any notice to Defendants, TQ Delta dropped two asserted patents against Nokia and three asserted patents against CommScope by electing to not address those patents in TQ Delta's opening expert reports. TQ Delta's antics caused both Nokia and CommScope to expend significant time and resources preparing expert invalidity reports on patents that TQ Delta never intended to pursue.

With rebuttal reports due on September 20th, and with a hearing before this Court set for September 1st, Defendants respectfully request leave to file a supplemental brief to address these developments and to explain why they support entry of a second focusing order now, prior to the September 20th deadline for rebuttal expert reports.

Dated: August 31, 2022

Respectfully submitted,

/s/ M. Scott Stevens

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*Counsel for Defendants
Nokia Corporation, Nokia Solutions
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of America Corporation*

Dated: August 31, 2022

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document has been served on all counsel of record via the Court's ECF system on August 31, 2022.

/s/ M. Scott Stevens

M. Scott Stevens

CERTIFICATE OF CONFERENCE

Pursuant to Local Rule CV-7(h), counsel for all parties met and conferred regarding the relief requested above on August 31, 2022. The parties met and conferred over telephone to resolve their dispute but were unable to do so.

/s/ M. Scott Stevens

M. Scott Stevens